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**VIA ECF**

This renewed motion to seal, which significantly narrows the proposed redactions, is sufficiently narrowly tailored in accordance with *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 124 (2d Cir. 2006), and its progeny. Accordingly, the motion is GRANTED. **The Clerk of the Court is respectfully directed to terminate the motion at ECF No. 821 and permit the documents filed under seal to remain under seal.**

United States District Judge  
 Southern District of New York  
 Daniel Patrick Moynihan United States Courthouse  
 500 Pearl Street  
 New York, NY 10007

**SO ORDERED:**

*Katharine H Parker*  
 HON. KATHARINE H. PARKER  
 UNITED STATES MAGISTRATE JUDGE

11/30/2023

**Re: *Spectrum Dynamics Medical Limited (Plaintiff) v. GE et al. (Defendants)***  
**Case No.: 18-cv-11386 (VSB)**

Dear Judge Parker:

Pursuant to Your Honor's Order at ECF No. 813 ("Order"), the parties respectfully submit this joint renewed motion to seal regarding their amended pleadings. Neither party opposes the other's requests set forth below.

**Spectrum's Statement Regarding Its Third Amended Complaint (ECF No. 795) ("TAC")**

Concurrently with this renewed motion, Spectrum is re-filing its TAC with more narrowly tailored redactions in accordance with the Order. Spectrum is removing nearly all the previously proposed redactions because the once-sensitive information has "become stale as this litigation has progressed," ECF No. 813 at 2, including because Defendants publicly disclosed that information via patent applications and/or by launching the StarGuide. The revised redactions seek only to protect competitively sensitive engineering drawings and documents that Spectrum disclosed to Defendants during the due diligence. *See, e.g.*, TAC ¶¶ 203, 226, 244, Ex. 29.

**Defendants' Statement Regarding Their Answer (ECF No. 798)**

The parties agree that no redactions are necessary in Defendants' Answer (Doc. 798) and that the Answer, as well as Exhibit A thereto, may be unsealed.

**Spectrum's Statement Regarding Its Response to Defendants' Answer (ECF No. 802)**

Spectrum respectfully submits that no narrowing of redactions is necessary. The proposed redactions are already limited to competitively sensitive engineering drawings and documents that Spectrum disclosed to Defendants during the due diligence. *See Response* ¶ 35.

For these reasons, the parties respectfully request that the Court grant this renewed motion to seal.



Hon. Katharine H. Parker  
November 29, 2023  
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Respectfully Submitted,

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